

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 22-20499

-v-

HON. TERRENCE G. BERG

CHRISTIAN ADAMS,

Defendant.

/

GOVERNMENT'S SENTENCING MEMORANDUM

I. Introduction

Christian Adams is a member of the violent R Block street gang. R Block is responsible many shootings in the city of Pontiac. The Probation Department noted that Adams, in particular, has been “connected to multiple shootings in Pontiac” (PSR ¶ 39). Adams’s first adult conviction was Carrying a Concealed Weapon after he brandished firearms and threatened to shoot up a woman’s residence. Undeterred, he continued to possess firearms days after he was sentenced to probation. Around the same time, Adams ordered twenty Glock switches, from Russia, designed to convert semiautomatic firearms into automatic firearms.

The ATF investigation revealed that, while on probation, Adams used straw purchasers to acquire firearms, sold firearms, posted pictures of himself with firearms, and talked about killing rival gang members. While still on probation,

Adams was arrested with a loaded firearm and an extended magazine in his backpack. When his residence was searched, the ATF found over 100 rounds of ammunition, empty gun boxes, and magazines.

Adams, at age 21, is now convicted of his third felony gun offense. His absolute disregard for the state court shows his lack of respect for the law. His association with R Block and relentless involvement with firearms proves he is a danger to the community. The government moves this Honorable Court to impose a sentence near the top of the sentencing guidelines.

II. Statement of Facts

In November of 2021, the ATF executed a search warrant at the home of Bryce Cato. The ATF seized Cato's phone. A forensic examination revealed text messages between Cato and Adams. These texts revealed that Cato purchased firearms for Adams. Thereafter, the ATF opened an investigation into Adams and learned he was a member of R Block, a violent street gang in Pontiac responsible for over 40 shootings within eighteen months.

A review of Adams's criminal history showed that, on July 21, 2020, Adams was arrested for Carrying a Concealed Weapon. (PSR ¶ 39). Adams and another R Block gang member threatened a woman when they brandished firearms and threatened to shoot up her home. They were arrested in a vehicle where both guns

were recovered. One of the guns was used in a shooting 34 days earlier. On September 28, 2020, Adams was sentenced to HYTA probation.

A little over a year later, on October 21, 2021, Adams was again arrested for Carrying a Concealed Weapon. He was found in a vehicle with Bryce Cato, a fellow member of R Block, with a firearm. On April 5, 2022, his HYTA status was revoked from his first arrest and he was sentenced to 180 days jail. He was later sentenced to an additional 90 days for his second arrest.

For the 18 months he was on probation, Adams was prohibited from possessing a firearm. Nevertheless, Adams completely disregarded the state court's order. Not only did he continue to possess firearms, but he also acquired several Glock switches which, under federal law, are considered machineguns.

A. Silencer Sales

The Russian website "Silencer-Sales" sold Glock conversion devices also known as Glock switches. After placing an online order, a customer would wire money to an individual in Russia. After the money was received, the Glock switch(es) would ship from Russia to the United States. In March of 2022, the ATF had an ongoing national investigation into the Silencer-Sales website. As part of the investigation, the ATF found two Gmail accounts associated with the website. A federal search warrant on the Gmail accounts yielded records and

communications related to individuals who purchased Glock switches in the United States.

A newly purchased Glock firearm is a semiautomatic firearm. A single round is fired from the weapon with each pull of the trigger. If a Glock switch is attached to the rear of a Glock, the switch will convert the semiautomatic Glock to an automatic weapon that can repeatedly shoot more than one shot by a single pull of the trigger. The switch is a part designed and intended solely and exclusively for use in converting a semiautomatic weapon into a machinegun.

In September of 2021, United States Customs and Border Protection (CBP) intercepted an international package from Russia labeled as “spare lawnmower parts”. The shipment contained twenty Glock switches. The package was destined to a location associated with Immanuel Gates, a member of R Block. On July 12, 2021 and July 31, 2021, two additional packages were successfully shipped from Russia to Gates. An investigation into Gates revealed that he ordered Glock switches from the Silencer-Sales website. Similar packages were shipped to Pontiac for Bryce Cato, also a member of R Block. Cato and Gates regularly communicated with Adams. See sections B and C below.

Records from the Silencer-Sales investigation established that, on June 24, 2021, Adams ordered two full auto Glock switches. He ordered the switches under the name Peter White, his Facebook profile name. The delivery address was 78

Oak Creek Lane, Pontiac. Secretary of State and MDOC records identified 78 Oak Creek Lane as Adams's residence. Adams also used the email address and phone number he provided to MDOC as his contact information for the orders. On July 14, 2021, Adams made two additional and separate orders for ten full auto Glock switches, for a total order of 20 switches.

On July 17, 2021, per Western Union records, Adams sent \$650 to K.R. of the Russian Federation. The money was received by someone in Russia on July 19, 2021. On July 26, 2021, a package was shipped from Russia and delivered to 78 Oak Creek Lane, Pontiac. The package, delivered to Adams's home, contained Glock switches.

B. Bryce Cato straw purchased firearms for Christian Adams

On November 19, 2021, the ATF executed a search warrant at Cato's residence in Pontiac. On November 22, 2021, the ATF obtained a search warrant for Cato's cellular phone. Cato's phone contained numerous conversations which established that Adams had Cato straw purchase firearms.

On August 1, 2021, while Adams was on probation in Oakland County, Adams and Cato made plans to purchase a FN¹ firearm. On August 2, 2021, at 10:41 a.m., Adams texted that he was at Cato's house to pick him up. At 11:55 a.m., Cato purchased a FN Herstal model FiveSeven, 5.7 caliber, semiautomatic

¹ FN Herstal is a company that manufactures firearms.

pistol. The pistol box and Michigan Pistol Sales Record, in the name of Bryce Cato, for the FN Herstal, were later found in Adams's home. See Section E below.

On September 7, 2021, Cato purchased a Draco semiautomatic pistol. On September 13, 2021, Cato asked Adams "Where the fns?" Adams responded that another gang member had one. He then told Cato that "they" lost his Draco and that "you could've had that." The Draco purchased on September 7, 2021, was recovered two days later from a known member of R Block after a high speed chase.

On September 17, 2021, Adams texted Cato that he needed a "stick." "Stick" is a street term for a firearm. On September 22, 2021, Cato texted Adams "Get them sticks back . . ." Adams asked "Who?" Cato responded, "Day." Day is a nickname for Dashawn Owens who was sentenced in case number 22-20134 for possession of a firearm by a person under indictment, 18 U.S.C. 922(n).

On September 28, 2021, Cato texted Adams a screenshot of a Detroit News article about an ATF investigation entitled "Group Sold Illegally Purchased Guns to Felon in Detroit . . ." Cato then texted Adams "Fs [for sure] need them ones in my name in your pos [possession]." On October 5, 2021, Adams texted Cato and told him to bring him a firearm.

Cato has been charged by Information for straw purchasing multiple firearms connected to multiple shootings and R Block.

C. Immanuel Gates's phone revealed Adams with firearms and texts from Adams about killing people

Immanuel Gates was also a member of R Block. On May 15, 2023, Gates pleaded guilty to illegal possession of a machinegun and aggravated identity theft. During the Gates investigation, the ATF conducted a forensic examination of Gates's cellular phone.

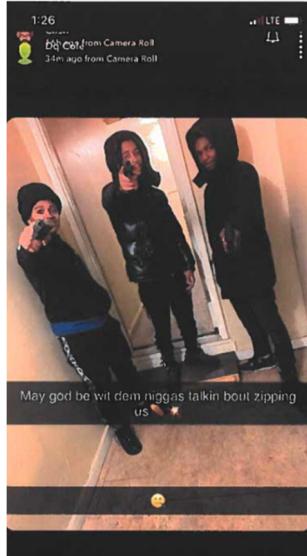
Six days after Adams was placed on HYTA probation, Adams told Gates that he just sold a gun and was waiting for the money. On October 4, 2020, Adams texted Gates that he "found someone to buy the FN . . ." Minutes later, Adams texted Gates that he needed a Glock or an FN. Gates reminded Adams that they cannot "get flicked [arrested] . . ." with Glock switches on their firearms. In response, Adams texted "Oh I'm already knowing . . . Federal Prison." Adams then texts that they can still carry the semiautomatic firearms.

That evening, Adams texted Gates "Anybody play wit me I want they face . . . Especially these lil hoe ass N****s . . . Dat keep trying us." Gates responds, "Once you kill you can't undo it." Adams texted, "Idc [I don't care]."

Less than 60 days after he was placed on HYTA probation, Adams possessed firearms. A screenshot, dated November 26, 2020, was taken from Gates's Instagram account. See Image One below. Gates (on the far left) points a Glock pistol at the camera. The individual in the middle is Adams. Superimposed over the image is the text "May god be wit dem n****s talkin bout zipping us"

with a coffin emoji and an explosion emoji. The individual on the far right is an identified R Block member.

Image One



The next day, November 27, 2020, Gates and two other individuals appeared in a video saved on Gates's phone. One of the other individuals appears to be Adams in possession of a Glock firearm. Superimposed over the video is the text "Weekend Ready". See Image Two below.

Image Two



D. Adams possessed a firearm with his fellow R Block members at a video shoot in a hotel in Auburn Hills, Michigan

On February 24, 2022, the ATF conducted surveillance outside of Adams's residence. At 7:22 a.m., Adams entered the residence wearing a black winter coat over a black and gray camouflage printed shirt. See Image Three below.

Image Three



The next day, OCSO detectives monitored a social media account with several known R Block members and associates of Adams. The social media posts depicted numerous R Block members and others inside a hotel room, at the Holiday Inn Express in Auburn Hills, during a "video shoot". The images posted to the account showed numerous individuals in possession of firearms including an individual dressed in the same gray and black camouflage long sleeved shirt worn by Adams the day before. See Images Four, Five, Six, and Seven. In Images Six and Seven, that individual was in possession of a firearm. (circled in red).

Image Four



Image Five



Image Six



Image Seven



A subsequent investigation in the video shoot led to a post-*Miranda* interview of a Source of Information (SOI). The SOI reported that Adams was at the video shoot in a black and gray mask and a hood. Further, that Adams possessed a firearm.

E. March 3, 2022, the ATF executed a search warrant at 78 Oak Creek Lane, Pontiac (Adams's residence)

On March 3, 2022, the ATF and OCSO executed a search warrant at Adams's residence. In Adams's bedroom, the ATF seized the following:

- One FN pistol box with a twenty round pistol magazine;
- A Michigan Pistol Sales Record for the FN pistol in the name of Bryce Cato dated August 2, 2021;
- Three pistol magazines; and
- Approximately 111 rounds of ammunition.

In the basement, alongside proof of residence related to Adams was the following:

- One Glock pistol box for a Glock 23;
- One Michigan Pistol Sales Record for the Glock in the name of Bryce Cato, dated November 8, 2021; and
- Two pistol magazines.

Before leaving the residence, the ATF showed Adams's mother an image posted to social media by a rival gang. In the image, the rival gang members posed in front of Adams's residence in possession of firearms. A male, present with Adams's mother, reported that he saw the men take the picture on March 1, 2022, and told Adams. His mother stated that, later that night, they heard three gun shots and took cover in their basement.

F. March 29, 2022, post-*Miranda* interview of Adams

On March 29, 2022, after waiving his *Miranda* rights, Adams denied knowing the location of the firearms associated with the boxes found in his residence. Regarding the FN Herstal gun box found under his bed, he claimed that it was there to hold up his broken bed. He admitted that he was present when the gun was purchased, but denied knowing the firearm's location. After an ATF agent showed Adams a picture of him in possession of an FN Herstal firearm and text messages, he stated that it was a while ago and that he did not remember when he received the firearm. Adams was unable to explain how the FN Herstal box got into his house.

Adams was asked about the Glock switches delivered to his house. Adams claimed that he did not have switches, he did not do anything with them, and he did not know what happened to them. Later in the interview, Adams advised that his Glock switches had been stolen two or three days after they arrived at his house. He explained that someone close to him stole the Glock switches from him, but refused to say who.

At the end of the interview, Adams showed the agents his recent R Block tattoo on his right arm.

III. Guideline Range

The United States Probation Department and the government calculated Adams's advisory guideline range as 46 to 57 months.

IV. Sentencing Factors, 18 U.S.C. § 3553(a)

The government moves the Court to impose a sentence at the upper end of the advisory guideline range.

A. Nature and circumstances of the offense; 18 U.S.C. § 3553(a)(1)

Christian Adams will not stay away from guns. At 21 years-old, Adams has three felony gun related convictions. During his probation, he posted pictures of himself with guns, hung around people with guns, made use of straw purchasers, purchased Glock switches, violated his probation, failed to appear for court, and sold firearms. Adams was on Gates's Instagram account pointing a Glock pistol at the camera. The next day, Adams is holding a firearm in a different post. Both posts contained threatening messages, likely directed toward rival gang members. The messages made it clear that Adams and the others in the posts were ready for violence.

Around the same time Adams got firearms from Cato he spent approximately \$1,000 purchasing Glock switches despite sporadic work for previous year and a half. A Glock switch can shoot approximately 1,200 rounds per minute. In a standard Glock handgun, it can fire approximately 30 rounds in two seconds. Adams ordered 22 Glock switches from Silencer-Sales. Adams fully

understood and appreciated the illegality of purchasing the Glock switches. In a text conversation with Gates, Adams told Gates he was going to federal prison if he was arrested with Glock switches. Adams reminded Gates that they could still carry semiautomatic firearms.

While Adams was buying handguns and Glock switches, he was also talking about shooting “lil hoe ass N****s” that kept “trying” them. Gates advised Adams that there was no going back from killing someone. Adams response was concise, simply telling Gates that he did not care.

B. The sentence imposed must reflect the seriousness of the offense and promote respect for the law; 18 U.S.C. § 3553(a)(2)(A)

The seriousness of the offense and Adams’s lack of respect for the law go hand in hand. Adams has proven that he does not and will not respect the law. He was sentenced on September 28, 2020, and six days later, texted Gates that he sold a gun and needed to get another gun. Between October of 2020, until his new gun arrest on October 21, 2021, Adams repeatedly violated the terms and conditions of his probation and the law.

His state probation officer wrote “[t]he defendant was given the benefit of sentencing pursuant to the Holmes Youthful Trainee Act . . . To date, the offender’s adjustment to community supervision can only be described as poor.” The defendant has been . . . seen in photos brandishing a firearm or accompanied by individuals brandishing firearms.” A violation report indicated that Adams

failed to comply with drug testing, failed to get his GED, and engaged in threatening and/or intimidating behavior.

Adams's convictions and behavior demonstrate his dangerousness. His first arrest in July of 2020 involved Adams brandishing firearms and threatening to shoot up the victim's residence. (PSR ¶ 39). His second arrest involved the seizure of a 9mm handgun, loaded with thirteen live rounds, and an extended magazine loaded with 31 live rounds. (PSR ¶ 40). The case before the Court involved Adams importing switches to convert handguns to machineguns. And, during the investigation, the ATF found a text where he expressed blatant indifference to killing.

Approximately four months after the state court issued a warrant for his violation of probation, in February of 2022, Adams was part of an R Block video shoot. The video showed Adams and other R Block members with firearms. This is consistent with a March 7, 2022, probation violation report which indicated Adams "has been identified as an active member of a street gang (R' Block) that has been connected to multiple shootings in the Pontiac area. [He] continues to associate with his street gang, as recently as this past weekend." Adams's constant possession of guns, given his current lifestyle, makes it inevitable that he will be shot or in a position of shooting someone else. Either way, the consequences will result in violence, death, and/or a long term period of incarceration for Adams.

The Court's sentence must convey the seriousness and dangerousness of his conduct. The sentence must also get across the importance of respecting the law. Adams must learn that society will not tolerate his behavior.

C. The sentence imposed must provide just punishment, afford adequate deterrence to criminal conduct, and protect the public from further crimes of the defendant 18 U.S.C. §§ 3553(a)(2)(B), (C), and (D)

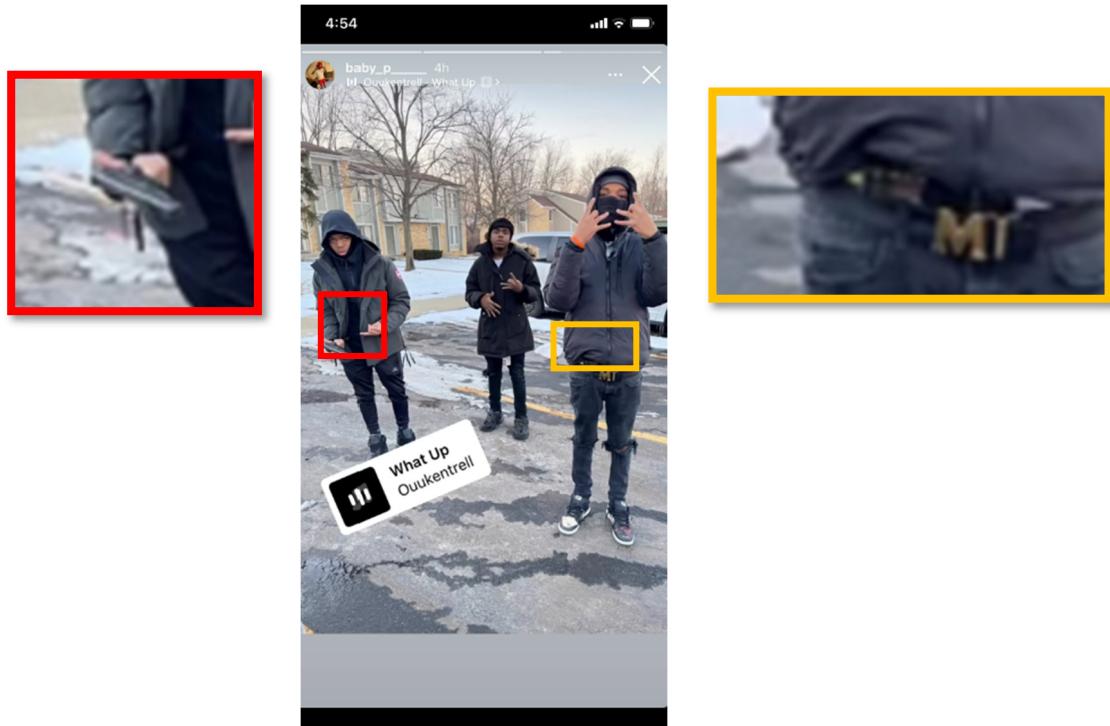
A guideline sentence is just punishment that takes into consideration the danger caused to himself and the community and his impudence toward the law and law enforcement.

Deterrence includes two components, “specific deterrence and general deterrence. Specific deterrence looks to dissuade an individual defendant from committing future crimes, while general deterrence aims to have the same effect on ‘the population at large.’” *United States v. Boucher*, 937 F.3d 702, 710 (6th Cir. 2019) (citation omitted). Both components are crucial in this case. First, Adams’s sentence must impart that the heavy cost of this behavior outweighs whatever he sought to accomplish by carrying firearms and importing machineguns. Second, the Court must send a strong message to other gang members in Pontiac that the consequences of illegally possessing firearms carries severe penalties. Whether by word of mouth or social media, gang members follow what happens to other gang members in court. This applies to members of the same gang and their rivals. A court can achieve deterrence by imposing a sentence that sends the message that

guns plus gangs equal a guideline sentence. Sentences outside of the guidelines countermine Congress's mandate that the sentence afford adequate deterrence to criminal conduct. In this case, deterrence is crucial to curtailing gang violence in Pontiac and discouraging Adams from engaging in criminal conduct in the future.

A top of the guideline sentence will also protect the community from Adams and his proclivity for carrying firearms. The sentence will also protect Adams's family. Two days before the ATF executed the search warrant at Adams's home, rival gang members – carrying firearms – took a picture in front of Adams's home. See Image Eight below. The male, in the home during the search warrant, told agents he saw them take the picture and called and informed Adams.

Image Eight



That night, when his mother heard three gunshots, she felt threatened and took cover in her basement. Little else could so clearly illustrate the danger created by Adams's behavior and lifestyle. The need to protect the community from Adams is crucial.

V. Conclusion

For the reasons argued herein, the government moves this Honorable Court to impose a sentence near the top of the guideline range.

Respectfully Submitted,

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Dated: June 7, 2023